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8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SANTA ROSA DIVISION
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12 IN RE:

13 SOLSTICE, LLC, et al.,

14 Debtors,

16 SOLSTICE, LLC,

17 Plaintiff,

18 vs.

19 GRAHAM KOS; TIM WOLFF; TIM
WELLER; CHAD MORSE; JAMES KIME;
20 SHAY LLC; BEALE LLC; WINSTON &
STRAWN LLP; JONATHAN COHEN;
21 NOVOGRADAC & COMPANY LLP; JON
KRABBENSCHMIDT; SHAY KOS; and
22 DOES 1 through 400,

23 Defendants.
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FILED

DEC 23 2009

U.S. BANKRUPTCY COURT
SANTA ROSA, CA

[S.D.N.Y. Bankr. Case No. 09-11010 (REG)]

Chapter 11 (Jointly Administered)

Adversary Proceeding No. _____

09 - 1186

NOTICE OF RELATED ADVERSARY PROCEEDINGS

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(1) On December 16, 2009, co-defendants Winston & Strawn LLP and Johnathan Cohen (collectively, “Winston & Strawn”) filed a related adversary proceeding. On December 17, 2009, Winston & Strawn filed a motion to transfer venue of that adversary proceeding to the Southern District of New York, where Plaintiff’s Chapter 11 bankruptcy case is pending.

(3) These adversary proceedings are related in that they both involve claims by the same plaintiff—Solstice, LLC (“Plaintiff”)—against Winston & Strawn and Novogradac, two firms who provided services to Plaintiff. These claims are asserted in the same underlying state court lawsuit, pending in the Superior Court of California, County of Marin, entitled ***Solstice LLC v. Graham Kos, et al.***, Case No. CIV 095755 (“the State Court Action”).

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1 In light of similarity of the claims, parties, transactions, and events, and to promote the
2 efficient adjudication of these two related adversary proceedings, Novogradac requests that these
3 matters be deemed related and transferred to a single Bankruptcy Judge.

4 Respectfully submitted,

5 Dated: December 12, 2009

LONG & LEVIT LLP

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7 By 

8 HOWARD M. GARFIELD
9 DAVID P. BOROVSKY
10 Attorneys for Defendants
11 NOVOGRADAC & COMPANY, LLP
12 and JON KRABBENSCHMIDT
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